

EXHIBIT C

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Clerk of Court

IN THE COURT OF COMMON PLEAS FOR THE STATE OF DELAWARE
IN AND FOR NEW CASTLE COUNTY

PLAINTIFF(S): PRISCILLA BORGES)
)
) CIVIL ACTION NO.
 v.)
)
 DEFENDANT(S): TRANSUNION, LLC)
)
) EQUIFAX INFORMATION SOLUTIONS, INC.
) EQUIFAX INFORMATION SERVICES, LLC

COMPLAINT

Brief Statement of the Nature of the Claim:

The defendants, TransUnion, Equifax, and Experian, have inaccurately reported a bankruptcy and related accounts on my credit report. I obtained my LexisNexis report, which does not contain a record of any bankruptcy filing under my name. This raises concerns about the accuracy of the information the credit bureaus are reporting. I formally disputed these inaccuracies with each credit bureau and requested verification of the source of their information. Despite my request, the defendants have failed to provide me with the verifying party information or proof of how they verified the bankruptcy and related accounts. This is a direct violation of the Fair Credit Reporting Act (FCRA) § 611(a)(7), which requires them to disclose the source of their information upon request. Furthermore, the credit bureaus failed to conduct a reasonable investigation, as required under the FCRA, and continue to report incorrect information that has negatively impacted my creditworthiness. Due to their negligence in maintaining accurate consumer reports, I have suffered financial harm, including denial of credit, higher interest rates, and emotional distress. Due to these reporting errors, I have experienced severe stress, anxiety, and loss of financial opportunities, including loan denials and increased interest rates on existing credit accounts. I am seeking damages for their failure to comply with the FCRA, as well as the removal of all incorrect information from my credit report.

Relief Sought:

Plaintiff seeks monetary damages in the amount of **\$10,000** for financial and emotional harm caused by inaccurate credit reporting, and requests correction and deletion of all inaccurate information from Plaintiff's credit reports.

- \$10,000 — Damages
- \$255 — Court costs
- TOTAL: \$10,255

PLAINTIFF'S NAME: PRISCILLA BORGES
PLAINTIFF'S SIGNATURE:
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